

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

LINDA FAIRSTEIN,

Case No.: 2-20-CV-00180-TPB-NPM

Plaintiff,

v.

NETFLIX, INC., AVA DUVERNAY,  
and ATTICA LOCKE,

Defendants.

**MOTION TO ADMIT COUNSEL PRO HAC VICE, CONSENT TO DESIGNATION,  
AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC  
FILING**

Pursuant to Local Rule 2.02 of the United States District Court for the Middle District of Florida, the undersigned respectfully files this motion requesting the admission *pro hac vice* of Jacqueline A. Giannini, Esq. of the Dentons law firm, 233 South Wacker Drive, Suite 5900, Chicago, Illinois, (312) 876-2395, for purposes of appearing as counsel for Defendants, NETFLIX, INC., AVA DUVERNAY, and ATTICA LOCKE, and pursuant to Section 2(B) of CM/ECF Administrative Procedures, to permit Jacqueline A. Giannini to receive electronic filings in this case as follows:

1. Jacqueline A. Giannini is not admitted to practice in the Middle District of Florida and but is a member in good standing of the Illinois State Bar.

2. Movant, Kelley Geraghty Price, Esq., of the law firm of Dentons Cohen & Grigsby, P.C., 9110 Strada Place, Suite 6200, Naples, Florida 34018, (239) 390-1913 is a member in good standing of The Florida Bar and the United States District Court for the Middle District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as the

member of the Bar of this Court with whom opposing counsel may readily communicate regarding the conduct of this case, upon whom pleadings shall be served, who shall be required to electronically file all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures.

3. Jacqueline A. Giannini does not appear regularly in this Court to such a degree as to constitute the regular practice of law in the State of Florida.

4. Jacqueline A. Giannini is familiar with the Local Rules and the Code of Professional Responsibility of this Court and agrees to abide by them, as well as other ethical limitations or requirements governing the professional behavior of members of the Florida Bar.

5. Kelley Geraghty Price, Esq. has been designated as local counsel for Defendants, upon whom all notices and papers may be served, and who will be responsible for the progress of the case, including trial, along with Jacqueline A. Giannini.

6. Pursuant to Local Rule 2.02(a), Kelley Geraghty Price certifies that Jacqueline A. Giannini has complied with the fee requirements of Local Rule 2.01(d) and will complete the e-filing registration.

7. Jacqueline A. Giannini, by and through designated counsel and pursuant to Section 2(B) of CM/ECF Administrative Procedures, hereby requests the Court to Notice of Electronic Filings to Jacqueline A. Giannini at the email address: jacqui.giannini@dentons.com.

WHEREFORE, Kelley Geraghty Price, Esq. respectfully requests that an Order be entered permitting Jacqueline A. Giannini, Esq. to appear before this Court as counsel for Defendants, NETFLIX, INC., AVA DUVERNAY, and ATTICA LOCKE, for all purposes

relating to the proceedings in the above-styled case and directing the Clerk to provide notice of electronic filings to Jacqueline A. Giannini.

**DENTONS COHEN & GRIGSBY P.C.**

/s/ Kelley Geraghty Price

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(*pro hac vice* admission pending)

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Dated: May 7, 2020

*Attorneys for Defendants*

*NETFLIX, INC., AVA DUVERNAY and ATTICA*

*LOCKE*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of May, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Kelley Geraghty Price